

AO 91 (Rev. 08/09) Criminal Complaint

Clerk, U.S. District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

NOV 12 2014

David J. Bradley, Clerk of Court

United States of America

v.

Jeremy Allen SHADLE

Case No.

C-14-1211M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10-12-2014 to 11-12-2014 in the county of Nueces in the
Southern District of Texas, the defendant(s) violated:

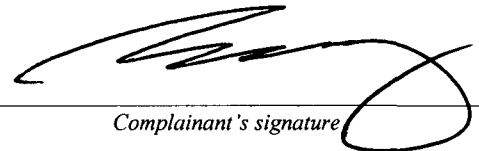
Code Section
Title 18 U.S.C. 2250

Offense Description
Failing to Register as a Sex Offender

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.



Complainant's signature

Alfredo A. Lujan

Printed name and title

Sworn to before me and signed in my presence.

Date:

November 12, 2014

City and state:

Corpus Christi, Texas



Judge's signature

Judge Jason B. Libby

Printed name and title

ATTACHMENT "A"
STATEMENT OF FACTS

I, Alfredo Lujan, Deputy United States Marshal, hereby depose and say: I am a Criminal Investigator / Deputy United States Marshal assigned to the Corpus Christi, Gulf Coast Violent Offender and Fugitive Task Force. I have been with the United States Marshals Service over eleven years. My responsibility is to investigate crimes involving individuals who are convicted sex offenders and that have failed to register as required by Title 18 United States Code 2250; also known as the Adam Walsh Child Protection and Safety Act of 2006.

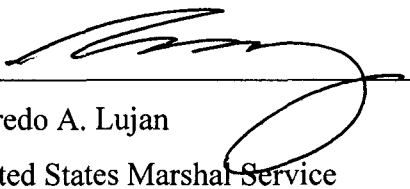
1. On October 16, 2014, Deputy Lujan received information that SHADLE was living in Port Aransas, Texas.
2. Deputy Lujan conducted a criminal history check that revealed SHADLE is a registered sex offender in the State of Colorado.
3. Court records show that on August 22, 2006, SHADLE was charged in a Information, in Denver County in the State of Colorado in case # 06CR5234. Count one charged SHADLE with Criminal Attempt to Commit Sexual Assault, in violation of C.R.S. 18-3-402(1)(a),(4);18-2-101. Count two charged SHADLE Criminal Attempt to Commit Unlawful Sexual Contact – No Consent – With Force/Threats Aggravators, in violation of C.R.S. 18-3-404(1)(a),(2);18-3-402(4). Count three charged SHADLE with Criminal Attempt to Commit Sexual Assault, in violation of C.R.S. 18-3-402(1)(a);18-2-101.
4. On October 26, 2006, SHADLE pleaded guilty to Count three Criminal Attempt to Commit Sexual Assault, in violation of C.R.S. 18-3-402(1)(a). SHADLE was sentenced to be six (6) years imprisonment in the Colorado Department of Corrections.
5. On March 15, 2012, SHADLE is released from the Colorado Department of Corrections and registers with the Denver Police Department as a Sex Offender and is required to register for life in the State of Colorado.

6. On January 21, 2014, SHADLE registers as a sex offender with the Denver Police Department, and acknowledges his duties to register.
7. On April 4, 2014, SHADLE registers as a sex offender with the Guadalupe County Sheriff's Office in Texas. SHADLE states that that he is living at [REDACTED] in New Braunfels, Texas. SHADLE also signs the sex offender forms stating that he understands his duty to register.
8. On July 3, 2014, the Denver Police Department issues a misdemeanor warrant for SHADLE, for Failing to Register as a Sex Offender in case # 14-5002053.
9. On August 11, 2014, SHADLE advises the Guadalupe County Sheriff's Office he is going to Fort Wayne, Indiana.
10. On August 11, 2014, SHADLE is in custody in the Allen County Jail in Allen County, Indiana.
11. On August 25, 2014, SHADLE is released from the Allen County jail.
12. On August 25, 2014 SHADLE registers with the DeKalb County Sheriff's Office in Indiana, as a sex offender, and states that he is living at [REDACTED] in Garrett, Indiana. SHADLE also signs the sex offender forms stating that he understands his duty to register. Line 19, also informs SHADLE about the Adam Walsh Child Protection Act of 2006, Title 18 United States Code 2250, and his "responsibility to obey both the federal law and the laws of the state."
13. On September 2, 2014, SHADLE is arrested in a theft charge and is placed in the Allen County jail, in Allen County, Indiana.

14. On September 11, 2014, the Denver Police Department issues a felony warrant for SHADLE, for Failing to Register as a Sex Offender in case # 14-5002916.
15. On September 26, 2014 SHADLE is released from the Allen County jail.
16. On November 3, 2014, Deputy Lujan interviewed Cynthia Hein. Mrs. Hein is the property manager of Beachhead Condos located at [REDACTED] in Port Aransas, Texas. In a written statement, Mrs. Hein stated that she saw SHADLE on or about the 12 or 13th of October at apartment [REDACTED]. Mrs. Hein also stated that as of November 3, 2014, SHADLE was moving to apartment [REDACTED].
17. The Texas Department of Public Safety has determined that SHADLE'S conviction of Criminal Attempt to Commit Sexual Assault is substantially similar to 22. 011(a)(1), & 15.01 Criminal Attempt Sexual Assault and is required to register as a sex offender for Post Ten years in the State of Texas. SHADLE must register as a sex offender in Texas till November 15, 2023.
18. On November 7, 2014, Officer Jason Atwater with the Port Aransas Police Department makes contact with SHADLE at the ferry landing in Port Aransas, Texas. SHADLE stated that he was living at [REDACTED] in Port Aransas, Texas.
19. Deputy Lujan checked with Ms. Sue Williams from the Port Aransas Police Department, Sex Offender Unit, to see if SHADLE has registered with the Port Aransas Police Department. The search showed that SHADLE has not registered as a sex offender with the department.
20. Deputy Lujan also checked with the Texas Department of Public Safety to see if SHADLE has ever re-registered anywhere in the State of Texas. The search showed that SHADLE has not re-registered as a sex offender anywhere in the State of Texas.

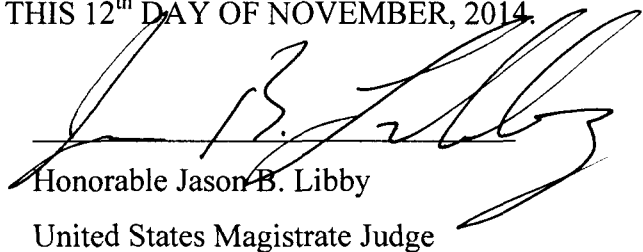
21. SHADLE has been living in the Southern District of Texas from on or about October 12, 2014 to November 12, 2014, without registering with the Port Aransas Police Department.

22. SHADLE is violation of 18 U.S.C. § 2250, Sex Offender and Crimes Against Children Registry, also known as the Adam Walsh Protection and Safety Act of 2006, for failure to register as a sex offender in the State of Texas, and having traveled from the State of Indiana, to the State of Texas.



Alfredo A. Lujan
United States Marshal Service

SUBSCRIBED AND SWORN TO BEFORE ME THIS 12th DAY OF NOVEMBER, 2014.



Honorable Jason B. Libby
United States Magistrate Judge

Approved by Hugo Martinez
Assistant United States Attorney